



November 20, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Ms. Dortch:

On behalf of Stainless LLC ("Stainless"), I am submitting this letter to provide clarification with respect to the October 31st meeting at the FCC attended by Dielectric, LLC, Stainless, Vertical Technology Services, LLC, and American Tower Corporation.

As discussed at the meeting, Stainless does have ongoing efforts to increase the number of crews available and expects that these measures will help relieve the current scheduling challenges, especially if the FCC provides additional flexibility for broadcasters to use auxiliary antennas. Stainless plans to roughly double the number of crews it has available by expanding the number of U.S. crews dedicated to the repacking effort and by bringing in trained, competent crews from Europe. We expect that these measures will provide additional capacity to support station moves in earlier phases than was previously planned by the Commission.

While the exact timing of our crews' availability is not certain, Stainless is expediting its staffing efforts and the resources will be available as the repack progresses. To help ensure satisfaction of the near-term repacking deadlines and the success of the overall repacking effort, Stainless respectfully asks the Commission to address manufacturer and station timing issues with regard to the use of interim, auxiliary antennas. This flexibility should help ensure that the repack schedule is met in an expedient, but safe and orderly manner. The additional Stainless crews will provide significant relief to the repacking effort, including by helping stations move from interim to permanent facilities when necessary.

Please do not hesitate to contact me with any questions.

Respectfully submitted,


Donald Doty
Business Development Manager